



U.S. Department of Justice

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August 1, 2025

By ECF

Hon. Katharine S. Hayden, U.S.D.J.
U.S. District Court for the District of New Jersey
Frank R. Lautenberg Post Office & U.S. Courthouse
2 Federal Square, Courtroom 5
Newark, NJ 07101

**Re: *Student Does 1-6 v. Noem et al.*, Civ. No. 25-02998
Consent Request to Extend All Dates by One Week**

Dear Judge Hayden:

This Office represents the federal officials from the Department of Homeland Security sued in their official capacities (collectively, “DHS”) under the Administrative Procedure Act (“APA”). I write with the consent of the Plaintiffs to seek a one-week extension of all established calendar dates for limited discovery and briefing the Defendants’ motion to dismiss.

If the Court grants DHS’ request, the new deadlines will be as follows:

- August 11: Defendants’ motion to dismiss
- August 14: Defendants will complete production of responses to the limited, expedited discovery and will produce documents on a rolling basis
- September 17: Plaintiffs’ opposition to the motion to dismiss
- October 1: Defendants’ reply in support of the motion to dismiss

We respectfully suggest that good cause exists for this extension because this Office is handling several new emergent matters with limited resources. In addition, the motion and the responses to discovery require coordination between this Office, DHS, and the Department of Justice in Washington, D.C., which will take additional time.

If the Court is willing to grant this application, we respectfully request that Your Honor “So Order” this letter and submit it to the Clerk for docketing.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

ALINA HABBA
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By: /s/ John T. Stinson
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cc: all counsel of record (by ECF)